

WILMERHALE

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VIA ECF

The Honorable Colleen McMahon
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Michael Carroll, et al.*, No. 19-cr-545 (CM)

Dear Chief Judge McMahon:

The defendants in the above-captioned case write to request an adjournment of trial in this case until September 20, 2021. The government consents to our request.

This case is currently scheduled for trial in May 2021, pending approval from the Court's trial panel. In light of the challenges that the ongoing COVID-19 pandemic presents to defendants' ability to prepare their defense to the complicated accounting fraud allegations in this case, we ask that the Court adjourn the trial date until September 20, 2021. The parties agree to exclude time under the Speedy Trial Act until September 20, in order to, among other things, allow the defense to prepare given COVID-19.

Respectfully submitted,

/s/ Peter G. Neiman

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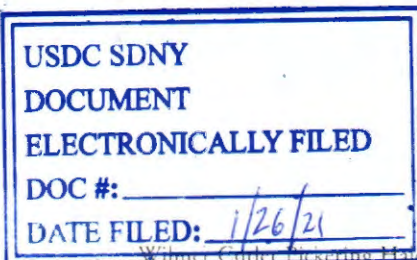
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MEMO ENDORSED



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1/25/2021
I will request a
trial date no earlier
than September 20 -
probably a fourth
quarter date if
operations are
not back to normal.
I cannot presently
give you a precise date
H